IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

MAR 2 5 2011

In re:

: Chapter 11

CIRCUIT CITY STORES, INC.,

: Case No. 08-35653 (KRH)

D

et al.

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Debtors.

: Jointly Administered

Re: Claim No. 4756

Amount: \$2,000.00

RESPONSE TO LIQUIDATING TRUST'S SEVENTH OMNIBUS OBJECTION

The Claimant, Brian L. LaCoursiere ("LaCoursiere"), for his Response to the Objection states as follows:

- 1. He has read the Liquidating Trust's Seventh Omnibus Objection and states as to his two thousand dollars (\$2,000.00) claim. The claim is based upon promised retention pay from the Debtor. Claimant complied until the operations of the Debtor closed down was not paid his retention bonus of two thousand dollars (\$2,000.00).
- 2. Under Exhibit "D" this claim is treated as duplicate. To the extent that there is any duplicate, there was no objection to the duplication, but the two thousand dollar (\$2,000.00) claim should be paid on the reasons heretofore stated. This claim is not a duplication of 4748. The two claims are mutually exclusive.

- 3. The statements made herein are made by Brian L. LaCoursiere, 4347 Kings Church Road, Taylorsville, Kentucky 40071-7907 based on his personal knowledge of the relevant facts that support this response. These statements should also be supplemented by the matters set forth in the Claim originally filed.
- 4. Any relevant document was submitted with the Claim previously.

Under penalties of perjury, I declare that I have examined this Response and to the best of my knowledge and belief, the statements contained therein are true, correct and complete.

Brian L. LaCoursiere, Pro Se 4347 Kings Church Road

Taylorsville KY 40071-7907

CERTIFICATE

It is hereby certified that a copy hereof was on the 24% day of March, 2011, served by mail on the following:

Jeffrey N. Pomerantz. Esq. Andrew W. Caine, Esq. (admitted pro hac vice) PACHULSKI STANG ZIEHL & JONES LLP 10100 Santa Monica Boulevard Los Angeles, California 90067-4100 Telephone: (301) 277-6910 Telecopy: (310) 201-0760

Lynn L. Tavenner, Esq. (VA Bar No. 30083) Paula S. Beran, Esq. (VA Bar No. 34679) TAVENNER & BERAN, PLC 20 North Eighth Street, 2nd Floor Richmond, Virginia 23219 Telephone: (804) 783-8300 Telecopy: (804) 783-0178

This is also to certify that I sent the original of this Response by Federal Express Tracking No. 8730/0/82240 on March 24%, 2011 for next day delivery to:

United States Bankruptcy Court 701 East Broad Street - Room 5000 Richmond, Virginia 23219

Brian L. LaCoursiere, Pro Se

4347 Kings Church Road

Taylorsville KY 40071-7907